

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**DEANDRE JOHNSON,** )  
                                )  
**Plaintiff,**              )  
                                ) **Case No.: 2:16-cv-00078-MRH**  
**v.**                         )  
                                ) **MOTION TO REOPEN**  
**MIDLAND CREDIT**           )  
**MANAGMENT**                )  
**Defendant**                )  
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NOW COMES Plaintiff, Deandre Johnson, by and through counsel, Amy L.B. Ginsburg of Kimmel & Silverman, P.C., and moves this Honorable Court to lifts its stay of January 28, 2016, and administratively reopen the case. See Docket Entry No. 9. Plaintiff's counsel conferred with Defendant's counsel and Defendant's counsel consents to the relief requested in this Motion. Wherefore, Plaintiff respectfully asks that this Honorable Court grant his Motion.

DATED: March 15, 2016

BY: /s/Rachel Rebecca Stevens  
Rachel Rebecca Stevens, Esquire  
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Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via ECF on the following counsel of record on this 15th day of March 2016:

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Dated: March 15, 2016

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